

Victoria Le, Esq. SBN. 230452  
LAW OFFICES OF LONDON & LE  
415 Huntington Drive, Suite 101  
San Marino, California 91108  
Telephone: 626-639-3424

Chandao Nina Nantha, Esq. SBN 209955  
LAW OFFICES OF NANTHA & ASSOCIATES  
2000 E. 4<sup>th</sup> Street, Ste. 110  
Santa Ana, CA 92705  
Ph: 714-866-0412

Attorneys for Plaintiffs,  
MARTA ESTRADA, BENJAMIN MEJIA

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

MARTA ESTRADA, BENJAMIN MEJIA,	)	CASE NO.: 5:24-cv-01744JLS(SHKx)
	)	
Plaintiffs,	)	Hon. Josephine L. Staton
	)	
vs.	)	
	)	<b>REQUEST TO ENTER DEFAULT,</b>
DEPARTMENT OF THE NAVY, UNITED	)	<b>DECLARATION OF VICTORIA LE</b>
STATES OF AMERICA, and DOES 1-20,	)	
Inclusive,	)	
	)	
Defendant.	)	
	)	
	)	
	)	

TO: THE CLERK OF THE ABOVE-ENTITLED COURT

Plaintiffs MARTA ESTRADA and BENJAMIN MEJIA hereby requests that the Clerk of the above-entitled Court enter default in this matter against Defendant DEPARTMENT OF THE NAVY, UNITED STATES OF AMERICA on the ground that said defendant has failed to appear or otherwise respond to the complaint within the time prescribed by the Federal Rules of Civil Procedure 12(a)(2).

///

///

1 Plaintiff served the complaint on Defendant DEPARTMENT OF THE NAVY, UNITED  
2 STATES OF AMERICA on via the U.S. Department of Justice on November 27, 2024, Exhibit  
3 'A', and upon Defendant DEPARTMENT OF THE NAVY, UNITED STATES OF AMERICA  
4 on December 3, 2025, Exhibit 'B', evidenced by the proof of service of summons on file with  
5 this Court and attached hereto.

6 The above stated facts are set forth in the accompanying declaration of Victoria Le filed  
7 herewith.

8 DATED: February 5, 2025

LAW OFFICES OF LONDON & LE

9 By: 

10 VICTORIA LE, ESQ.

11 Attorney for Plaintiffs

12 MARTA ESTRADA, BENJAMIN MEJIA  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

Victoria Le, Esq. SBN. 230452  
LAW OFFICES OF LONDON & LE  
415 Huntington Drive, Suite 101  
San Marino, California 91108  
Telephone: 626-639-3424

Chandao Nina Nantha, Esq. SBN 209955  
LAW OFFICES OF NANTHA & ASSOCIATES  
2000 E. 4<sup>th</sup> Street, Ste. 110  
Santa Ana, CA 92705  
Ph: 714-866-0412

Attorneys for Plaintiffs,  
MARTA ESTRADA, BENJAMIN MEJIA

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

MARTA ESTRADA, BENJAMIN MEJIA,	)	CASE NO.: 5:24-cv-01744JLS(SHKx)
	)	
Plaintiffs,	)	Hon. Josephine L. Staton
	)	
vs.	)	
	)	<b>DECLARATION OF VICTORIA LE</b>
DEPARTMENT OF THE NAVY, UNITED	)	
STATES OF AMERICA, and DOES 1-20,	)	
Inclusive,	)	
	)	
Defendant.	)	
	)	
	)	
	)	

**DECLARATION OF VICTORIA LE**

I, Victoria Le, declare as follows:

1. I am an attorney at law duly licensed to practice before all courts of the State of California and in the Central District of this District Court. I am an attorney of record for Plaintiffs MARTA ESTRADA and BENJAMIN MEJIA herein.

///

///

1 I have personal knowledge of the facts contained in this declaration and if called as a witness, I  
2 could and would testify competently to these matters under oath.

3 2. Exhibit 'A' is the Proof of Service of Summons served upon Defendant  
4 DEPARTMENT OF THE NAVY, on December 3, 2024, filed with this court on December 6,  
5 2024 (Docket # 14).

6 3. Exhibit 'B' is the Proof of Service of Summons served upon U.S. Department of  
7 Justice, on November 27, 2024, filed with this court on December 6, 2024 (Docket # 15).

8 4. Exhibit 'C' are the Certified Mail receipts evidencing that the General Counsel of  
9 the Navy received the Summons and Complaint on December 10, 2024, and received by the U.S.  
10 Department of Justice on December 3, 2024.

11 I declare under penalty of perjury the foregoing is true and  
12 correct. Executed on February 5, 2025, at San Dimas, California.

13   
14 VICTORIA LE  
15 Declarant

EXHIBIT “A”

POS-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Victoria Le, Esq. (SBN 230452) 415 Huntington Drive, Suite 101 San Marino, CA 91108		FOR COURT USE ONLY
TELEPHONE NO.: (626) 639-3424 FAX NO. (Optional): (626) 639-3686 E-MAIL ADDRESS (Optional): londonandle@gmail.com ATTORNEY FOR (Name): Plaintiffs Marta Estrada, Benjamin Mejia		
SUPERIOR COURT OF CALIFORNIA, COUNTY OF CENTRAL DISTRICT OF CALIFORNIA STREET ADDRESS: 350 West 1st St. MAILING ADDRESS: 350 West 1st St. CITY AND ZIP CODE: Los Angeles 90012 BRANCH NAME: United States District Court, Central District of California		
PLAINTIFF/PETITIONER: Marta Estrada, Benjamin Mejia DEFENDANT/RESPONDENT: Department of the Navy, United States of America, et al.		CASE NUMBER: ED CV 24-01744-JLS(SHKx)
PROOF OF SERVICE OF SUMMONS		Ref. No. or File No.:

(Separate proof of service is required for each party served.)

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
  - a. ☒ summons
  - b. ☒ complaint
  - c. ☐ Alternative Dispute Resolution (ADR) package
  - d. ☒ Civil Case Cover Sheet (served in complex cases only)
  - e. ☐ cross-complaint
  - f. ☒ other (specify documents): Demand Jury Trial; Cert./Notice of Int. Parties; Not. of Assign.; Not. of Consent to Proceed
3. a. Party served (specify name of party as shown on documents served):  
Department of the Navy, et al.  
b. ☒ Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made) (specify name and relationship to the party named in item 3a):  
Ramona Smith, Legal Technician and Authorized Agent of Department of the Navy.
4. Address where the party was served:  
720 Kennon St., SE, Bldg. 36, Room 233, Washington Navy Yard, DC 20374
5. I served the party (check proper box)
  - a. ☒ **by personal service.** I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on (date): December 3, 2024 (2) at (time): 12:09 p.m.
  - b. ☐ **by substituted service.** On (date): at (time): I left the documents listed in item 2 with or in the presence of (name and title or relationship to person indicated in item 3):
    - (1) ☐ **(business)** a person at least 18 years of age apparently in charge at the office or usual place of business of the person to be served. I informed him or her of the general nature of the papers.
    - (2) ☐ **(home)** a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.
    - (3) ☐ **(physical address unknown)** a person at least 18 years of age apparently in charge at the usual mailing address of the person to be served, other than a United States Postal Service post office box. I informed him or her of the general nature of the papers.
    - (4) ☐ I thereafter mailed (by first-class, postage prepaid) copies of the documents to the person to be served at the place where the copies were left (Code Civ. Proc., § 415.20). I mailed the documents on (date): from (city): or ☐ a declaration of mailing is attached.
    - (5) ☐ I attach a **declaration of diligence** stating actions taken first to attempt personal service.

POS-010

PLAINTIFF/PETITIONER: Marta Estrada, Benjamin Mejia DEFENDANT/RESPONDENT: Department of the Navy, United States of America, et al.	CASE NUMBER: ED CV 24-01744-JLS(SHKx)
---	--

5. c. ☐ by mail and acknowledgment of receipt of service. I mailed the documents listed in item 2 to the party, to the address shown in item 4, by first-class mail, postage prepaid,
- (1) on (date): (2) from (city):
- (3) ☐ with two copies of the *Notice and Acknowledgment of Receipt* and a postage-paid return envelope addressed to me. (Attach completed Notice and Acknowledgment of Receipt.) (Code Civ. Proc., § 415.30.)
- (4) ☐ to an address outside California with return receipt requested. (Code Civ. Proc., § 415.40.)
- d. ☐ by other means (specify means of service and authorizing code section):

☐ Additional page describing service is attached.

6. The "Notice to the Person Served" (on the summons) was completed as follows:
- a. ☐ as an individual defendant.
- b. ☐ as the person sued under the fictitious name of (specify):
- c. ☐ as occupant.
- d. ☒ On behalf of (specify): Department of the Navy, United States of America  
under the following Code of Civil Procedure section:
- |   |   |
|---|---|
| <input type="checkbox"/> 416.10 (corporation)                     | <input type="checkbox"/> 415.95 (business organization, form unknown) |
| <input type="checkbox"/> 416.20 (defunct corporation)             | <input type="checkbox"/> 416.60 (minor)                               |
| <input type="checkbox"/> 416.30 (joint stock company/association) | <input type="checkbox"/> 416.70 (ward or conservatee)                 |
| <input type="checkbox"/> 416.40 (association or partnership)      | <input type="checkbox"/> 416.90 (authorized person)                   |
| <input checked="" type="checkbox"/> 416.50 (public entity)        | <input type="checkbox"/> 415.46 (occupant)                            |
|   | <input type="checkbox"/> other:                                       |

7. Person who served papers

- a. Name: Jacob Holahan
- b. Address: 1413 K. St., NW, 7th Floor, Washington DC, 20005
- c. Telephone number: (202) 398-4200
- d. The fee for service was: \$ 235.00
- e. I am:
- (1) ☒ not a registered California process server.
- (2) ☐ exempt from registration under Business and Professions Code section 22350(b).
- (3) ☐ a registered California process server:
- (i) ☐ owner ☐ employee ☐ independent contractor.
- (ii) Registration No.:
- (iii) County:

8. ☒ I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
- or

9. ☐ I am a California sheriff or marshal and I certify that the foregoing is true and correct.

Date: 12-06-2024

Jacob Holahan

(NAME OF PERSON WHO SERVED PAPERS/SHERIFF OR MARSHAL)

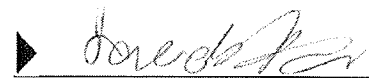
  
(SIGNATURE)

EXHIBIT “B”



POS-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Victora Le, Esq. (SBN 230452) 415 Huntington Drive, Suite 101 San Marino, CA 91108		FOR COURT USE ONLY
TELEPHONE NO.: (626) 639-3424 FAX NO. (Optional): (626) 639-3686 E-MAIL ADDRESS (Optional): londonandle@gmail.com ATTORNEY FOR (Name): Plaintiffs Marta Estrada, Benjamin Mejia		
SUPERIOR COURT OF CALIFORNIA, COUNTY OF CENTRAL DISTRICT OF CALIFORNIA STREET ADDRESS: 350 West 1st St. MAILING ADDRESS: 350 West 1st St. CITY AND ZIP CODE: Los Angeles 90012 BRANCH NAME: United States District Court, Central District of California		
PLAINTIFF/PETITIONER: Marta Estrada, Benjamin Mejia DEFENDANT/RESPONDENT: Department of the Navy, United States of America, et al.		CASE NUMBER: ED CV 24-01744-JLS(SHKx)
<b>PROOF OF SERVICE OF SUMMONS</b>		Ref. No. or File No.:

(Separate proof of service is required for each party served.)

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
  - a. ☒ summons
  - b. ☒ complaint
  - c. ☐ Alternative Dispute Resolution (ADR) package
  - d. ☒ Civil Case Cover Sheet (served in complex cases only)
  - e. ☐ cross-complaint
  - f. ☒ other (specify documents): Demand Jury Trial; Cert./Notice of Int. Parties; Not. of Assign.; Not. of Consent to Proceed
3.
  - a. Party served (specify name of party as shown on documents served):  
US Department of Justice
  - b. ☐ Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made) (specify name and relationship to the party named in item 3a):
4. Address where the party was served:  
950 Pennsylvania Avenue, NW Washington, DC 2053
5. I served the party (check proper box)
  - a. ☐ **by personal service.** I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on (date): (2) at (time):
  - b. ☒ **by substituted service.** On (date): November 27, 2024 at (time): 3:13 p.m. I left the documents listed in item 2 with or in the presence of (name and title or relationship to person indicated in item 3):  
Department of Justice only accepts service via certified mail
    - (1) ☐ **(business)** a person at least 18 years of age apparently in charge at the office or usual place of business of the person to be served. I informed him or her of the general nature of the papers.
    - (2) ☐ **(home)** a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.
    - (3) ☐ **(physical address unknown)** a person at least 18 years of age apparently in charge at the usual mailing address of the person to be served, other than a United States Postal Service post office box. I informed him or her of the general nature of the papers.
    - (4) ☒ I thereafter mailed (by first-class, postage prepaid) copies of the documents to the person to be served at the place where the copies were left (Code Civ. Proc., § 415.20). I mailed the documents on (date): 11/21/2024 from (city): San Marino or ☐ a declaration of mailing is attached.
    - (5) ☒ I attach a **declaration of diligence** stating actions taken first to attempt personal service.

Page 1 of 2

POS-010

PLAINTIFF/PETITIONER: Marta Estrada, Benjamin Mejia	CASE NUMBER:
DEFENDANT/RESPONDENT: Department of the Navy, United States of America, et al.	ED CV 24-01744-JLS(SHKx)

5. c. ☐ **by mail and acknowledgment of receipt of service.** I mailed the documents listed in item 2 to the party, to the address shown in item 4, by first-class mail, postage prepaid,
- (1) on (date): (2) from (city):
- (3) ☐ with two copies of the *Notice and Acknowledgment of Receipt* and a postage-paid return envelope addressed to me. (*Attach completed Notice and Acknowledgement of Receipt.*) (Code Civ. Proc., § 415.30.)
- (4) ☐ to an address outside California with return receipt requested. (Code Civ. Proc., § 415.40.)
- d. ☐ **by other means** (*specify means of service and authorizing code section*):  
CCP § 415.40 Service by Mail with Return Receipt – Out of State Defendant. Served via certified mail on November 21, 2024 from San Marino, California.

☒ Additional page describing service is attached.

6. The "Notice to the Person Served" (on the summons) was completed as follows:
- a. ☐ as an individual defendant.
- b. ☐ as the person sued under the fictitious name of (*specify*):
- c. ☐ as occupant.
- d. ☒ On behalf of (*specify*): Department of the Navy, United States of America  
under the following Code of Civil Procedure section:
- |   |   |
|---|---|
| <input type="checkbox"/> 416.10 (corporation)                     | <input type="checkbox"/> 415.95 (business organization, form unknown) |
| <input type="checkbox"/> 416.20 (defunct corporation)             | <input type="checkbox"/> 416.60 (minor)                               |
| <input type="checkbox"/> 416.30 (joint stock company/association) | <input type="checkbox"/> 416.70 (ward or conservatee)                 |
| <input type="checkbox"/> 416.40 (association or partnership)      | <input type="checkbox"/> 416.90 (authorized person)                   |
| <input checked="" type="checkbox"/> 416.50 (public entity)        | <input type="checkbox"/> 415.46 (occupant)                            |
|   | <input type="checkbox"/> other:                                       |

7. **Person who served papers**

- a. Name: Alina Taylor
- b. Address: 415 Huntington Drive, Suite 101, San Marino, CA 91108
- c. Telephone number: (626) 639-3424
- d. **The fee** for service was: \$ 10.99
- e. I am:
- (1) ☒ not a registered California process server.
- (2) ☐ exempt from registration under Business and Professions Code section 22350(b).
- (3) ☐ a registered California process server:
- (i) ☐ owner ☐ employee ☐ independent contractor.
- (ii) Registration No.:
- (iii) County:

8. ☒ **I declare** under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
- or

9. ☐ **I am a California sheriff or marshal** and I certify that the foregoing is true and correct.

Date: 12/6/2024

Alina Taylor

(NAME OF PERSON WHO SERVED PAPERS/SHERIFF OR MARSHAL)



Alina Taylor

(SIGNATURE)

**INVESTIGATIVE DUE DILIGENCE AFFIDAVIT**

United States District Court for the Central District of California

Marta Estrada, et al.

Plaintiff(s),

vs.

Attorney: NONE

Law Offices of London and Le  
415 Huntington Drive, Suite 101  
San Marino CA 91108

Department of the Navy, United States of America, et al.

Defendant(s).



\*327249\*

Case Number: 5:24-cv-01744-JLS-SHK

Legal documents received by Same Day Process Service, Inc. was requested to provide an affidavit of due diligence for subject(s), U.S. Department of Justice on 11/27/2024 at 2:49 PM at 950 Pennsylvania Avenue, NW, Washington, DC 20530

The undersigned, swear and affirm that on **November 27, 2024 at 3:13 PM**, I did the following:

**NON-SERVED:** After careful inquiry and diligent attempts, I was unable to serve **U.S. Department of Justice the Summons in a Civil Action; Complaint in Negligence; Civil Cover Sheet; Certification and Notice of Interested Parties; Notice of Assignment to United States Judges; Notice to Counsel Re Consent to Proceed Before a United States Magistrate Judge** for the reason(s) indicated in the comments below:

Date/Time	Address	Remarks
11/27/2024-3:13 PM	950 Pennsylvania Avenue, NW Washington, DC 20530	Upon arrival, I called the department at (202) 514-1657. A man answered the phone, and I told him that I was a process server trying to serve court documents to the DOJ. The man told me that the documents had to be sent via certified mail because the DOJ does not accept service in hand. - Attempted by Cheryl Bingaman

**Cheryl Bingaman**  
Process Server

Internal Job ID:327249

Same Day Process Service, Inc.  
1413 K St., NW, 7th Floor  
Washington DC 20005  
(202)-398-4200  
info@samedayprocess.com



ALERT: EFFECTIVE NOVEMBER 29, 2024, INTERNATIONAL MAIL SERVICE TO CANADA IS TEM...

# USPS Tracking®

FAQs >

Tracking Number:

Remove X

70221670000330302684

Copy Add to Informed Delivery (<https://informedelivery.usps.com/>)

## Latest Update

Your item was picked up at a postal facility at 5:38 am on December 3, 2024 in WASHINGTON, DC 20530.

Get More Out of USPS Tracking:

USPS Tracking Plus®

### Delivered

Delivered, Individual Picked Up at Postal Facility

WASHINGTON, DC 20530  
December 3, 2024, 5:38 am

### Redelivery Scheduled for Next Business Day

WASHINGTON, DC 20530  
December 2, 2024, 10:36 am

### Arrived at Post Office

WASHINGTON, DC 20018  
December 2, 2024, 8:59 am

### In Transit to Next Facility

December 1, 2024

### Arrived at USPS Regional Facility

WASHINGTON DC DISTRIBUTION CENTER  
November 27, 2024, 2:25 pm

Feedback

4892 0306 3030 0000 0297 2207

U.S. Postal Service™ <b>CERTIFIED MAIL® RECEIPT</b> Domestic Mail Only	
For delivery information, visit our website at <a href="http://www.usps.com">www.usps.com</a> ®.	
OFFICIAL USE	
Certified Mail Fee \$	Postmark Here
Extra Services & Fees (check box, add fee as appropriate)	
<input checked="" type="checkbox"/> Return Receipt (hardcopy) \$	
<input type="checkbox"/> Return Receipt (electronic) \$	
<input type="checkbox"/> Certified Mail Restricted Delivery \$	
<input type="checkbox"/> Adult Signature Required \$	
<input type="checkbox"/> Adult Signature Restricted Delivery \$	
Postage \$	
Total Postage and Fees \$ 10.99	
Sent To U.S. Department of Justice	
Street and Apt. No., or PO Box No. 950 Pennsylvania Avenue, NW	
City, State, ZIP+4® Washington, DC 20530-0001	
PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions	

Arrived at USPS Regional Facility  
SANTA CLARITA CA DISTRIBUTION CENTER  
November 21, 2024, 10:13 pm

Hide Tracking History

What Do USPS Tracking Statuses Mean? (<https://faq.usps.com/s/article/Where-is-my-package>)

Text & Email Updates



USPS Tracking Plus®



Product Information



See Less ^

Track Another Package

Enter tracking or barcode numbers

## Need More Help?

Contact USPS Tracking support for further assistance.

FAQs

EXHIBIT “C”



**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

## 1. Article Addressed to:

General Counsel of the Navy  
720 Kennon St., SE, Bldg 36,  
Room 233  
Washington Navy Yard, DC 20374-5013



9590 9402 8291 3094 1870 64

## 2. Article Number (Transfer from service label)

7022 1670 0003 3030 2691

PS Form 3811, July 2020 PSN 7530-02-000-9053

**COMPLETE THIS SECTION ON DELIVERY**

## A. Signature

\* Ramona Smith

☐ Agent☐ Addressee

## B. Received by (Printed Name)

Ramona Smith

## C. Date of Delivery

12-10-24

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below:

☐ No

## 3. Service Type

☐ Adult Signature☐ Adult Signature Restricted Delivery☒ Certified Mail®☐ Certified Mail Restricted Delivery☐ Collect on Delivery☐ Collect on Delivery Restricted Delivery☐ Insured Mail☐ Insured Mail Restricted Delivery (over \$500)☐ Priority Mail Express®☐ Registered Mail™☐ Registered Mail Restricted Delivery☐ Signature Confirmation™☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

## 1. Article Addressed to:

U.S. Department of Justice  
950 Pennsylvania Ave, NW  
Washington, DC 20530-0001



9590 9402 8291 3094 1870 40

## 2. Article Number (Transfer from service label)

7022 1670 0003 3030 2684

PS Form 3811, July 2020 PSN 7530-02-000-9053

**COMPLETE THIS SECTION ON DELIVERY**

## A. Signature

X [Signature]

☐ Agent☐ Addressee

## B. Received by (Printed Name)

DEC 03 2024

## C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below:

☐ No

## 3. Service Type

☐ Adult Signature☐ Adult Signature Restricted Delivery☒ Certified Mail®☐ Certified Mail Restricted Delivery☐ Collect on Delivery☐ Collect on Delivery Restricted Delivery☐ Insured Mail☐ Insured Mail Restricted Delivery (over \$500)☐ Priority Mail Express®☐ Registered Mail™☐ Registered Mail Restricted Delivery☐ Signature Confirmation™☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

PROOF OF SERVICE CCP §§1013(a), 2015.5

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am over the age of 18 years, a resident of the aforesaid county and not a party to the within entitled action. My business address is 415 Huntington Drive, Suite 101, San Marino, CA 91108.

On **February 05, 2025**, I served the foregoing documents described as: **REQUEST TO ENTER DEFAULT, DECLARATION OF VICTORIA LE, DECLARATION OF VICTORIA LE, EXHIBITS** by placing the true copies thereof enclosed in a sealed envelope addressed as follows:

Thomas Campbell  
OFFICE OF THE JUDGE ADVOCATE GENERAL  
TORT CLAIMS UNIT NORFOLK  
9324 Virginia Avenue, Suite 104  
Norfolk, VA 23511-2949

Thomas.e.campbell1@navy.mil

**BY MAIL:** - I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under the practice, it would be deposited with U.S. Postal Services on the same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.

**BY PERSONAL SERVICE:** - I caused such envelope to be delivered by hand to the office(s) of the address set forth listed above.

**BY ELECTRONIC TRANSFER:** - I caused all the pages of the above-entitled document to be sent to the recipient(s) noted via electronic transfer (facsimile) at the respective telephone numbers indicated above.

**XXXX BY ELECTRONIC SERVICE:** - I caused all the pages of the above-entitled document to be sent to the recipient(s) noted via electronic mail.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed on **February 05, 2025** at San Marino, California.

*Alina Taylor*  
Alina Taylor